

Submitter Info:

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As a Certified Residential Appraiser in Florida I feel its my duty to comment on current appraisal conditions. As a trainee from 2001 until 2004 I worked very hard most times 80-90 hrs a week to hone and improve my skills as an appraiser, after certification in 2004 I began to establish my name and company with a clientel that I worked very hard to get by providing top quality appraisals to reputable clients only to be told by a third party that I cannot have my clients anymore and the fees that I received for my work has to be split by another third party for them to process an order to my company that I had no problem processing on my own. This is not capitalism in any form or fashion this is a fascist money grab from a group of capitalistic entrepreneurs and given to another group under the guise of capitalism.

Fair fees that have been established for years by the VA office or prior fees recorded on every HUD statement prior to 2009 would clearly indicate that typical fees were at a bare minimum of \$ 275-\$ 500 based on difficulty for the standard URAR, the FHA and VA average was \$ 425-\$450. Multiple family properties, ranged from \$ 450-\$800. Of course, these are my local areas. Without these fees, there is no chance of hiring trainees, office personal and necessary services required by AMC's such as local MLS and TRW which are online data sources, Errors & Omissions Insurance, Continuing Education and licensing fees.

The AMC's make the point that they are processing the order and need a certain amount to do so, then let them get that fee from their client which happens to be the bank/lender. The lender is not paying any fee to have these AMC's process the order for them. It also is very clear that the lender and amc are padding their profits off 60% of my fee that I use to rely on to hire trainees. There is no possible way that I can hire trainees and provide the neccessary resources to train them off 40-50% of the appraisal that they are currently.